

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

v.

\$21,000.00, U.S. Currency,
Defendant in rem.

§
§
§
§
§
§
§
§

CIVIL ACTION NO. 4:10-cv-01681

**VERIFIED CLAIM UNDER RULE G(5) OF THE SUPPLEMENTAL RULES
FOR CERTAIN ADMIRALTY AND MARITIME CLAIMS**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

COMES NOW Hyune Jung Yoon ("Claimant"), by and through undersigned counsel, files a Claim for \$21,000.00 in United States Currency and would show this Court as follows:

1. Rule G(5) of the Supplemental Rules for Admiralty and Maritime Claims, Forfeiture Actions in Rem, provides in relevant part:

(i) A person who asserts an interest in the defendant property may contest the forfeiture by filing a claim in the court where the action is pending.

The claim must:

(A) identify the specific property claimed;
(B) identify the claimant and state the claimant's interest in the property;
(C) be signed by the claimant under penalty of perjury; and
(D) be served on the government attorney designated under Rule G(4)(a)(ii)(C) or (b)(ii)(D).

2. Claimant identifies the \$21,000.00 in United States ("U.S.") Currency as his personal property. This is the same U.S. Currency that was seized from Claimant's person on April 29, 2010, by agents of the U.S. Customs and Border Protection Agency, at Bush Intercontinental Airport, Houston, Texas. This is the same U.S. Currency that is identified in the Government's Notice and Complaint dated May 11, 2010.

3. Claimant hereby makes Claim to the \$21,000.00 in U.S. Currency pursuant to Rule G(5).

4. This Claim is timely filed and not less than thirty-five (35) days since the date that the Notice and Complaint was filed.

5. Claimant resides at 265 Wathery Avenue, Ridgewood, New Jersey, 07450. Claimant retained the law firm of BAE LAW FIRM for this matter, and Claimant's attorney may be reached at the address provided below.

Claimant's attorney signs this Claim on behalf of Claimant. Claimant provides a Verification attached to this Claim as Exhibit "A".

Respectfully submitted,

BAE LAW FIRM

By:

Steve C. Bae
State Bar No. 24034311
800 W. Sam Houston Pkwy. N., Ste. 300
Houston, Texas 77024
(713) 850-0800
(832) 431-3032 Facsimile

ATTORNEY FOR CLAIMANT
HYUNE JUNG YOON

CERTIFICATE OF SERVICE

I certify that this Claim was served on Albert Ratliff, Assistant United States Attorney, by ECF filing on June 15, 2010.

/s/ Steve C. Bae
Steve C. Bae

VERIFICATION
UNDER PENALTY OF PERJURY PER 28 USC §1746(1)

CIVIL JURISDICTION OF
HONDURAS

§
§
§

The undersigned states that:

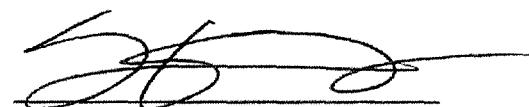
"My name is Hyune Jung Yoon. I am over the age of eighteen (18) and I am competent to make the following verification:

I am the Claimant in the foregoing Claim. I have read the attached VERIFIED CLAIM UNDER RULE G(5) OF THE SUPPLEMENTAL RULES FOR CERTAIN ADMIRALTY AND MARITIME CLAIMS, and that the facts stated in it are within my personal knowledge and that they are true and correct.

If called as a witness, I would testify in a court of law. I hereby swear, affirm and state that the foregoing is true and correct under penalty of perjury pursuant to Title 18 U.S.C. §1746."

I, HYUNE JUNG YOON, am currently outside the United States and hereby verify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this, the 10th day of June, 2010.



Hyune Jung Yoon

